

**From:** [Chapman, Apple](#)  
**To:** [Sullivan, Tim](#); [Williams, Christopher](#)  
**Subject:** Fwd: EPA - New Owner CAA Audit Program for Oil & Gas  
**Date:** Monday, May 14, 2018 4:47:01 PM

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Can one of you be the keeper/organizer of the comments we received? Thanks!

Sent from my iPhone

Begin forwarded message:

**From:** Rusty Ruby <[rruby@utah.gov](mailto:rruby@utah.gov)>  
**Date:** May 14, 2018 at 4:04:31 PM EDT  
**To:** [chapman.apple@epa.gov](mailto:chapman.apple@epa.gov)  
**Cc:** Jay Morris <[jpmorris@utah.gov](mailto:jpmorris@utah.gov)>, Bryce Bird <[bbird@utah.gov](mailto:bbird@utah.gov)>  
**Subject:** EPA - New Owner CAA Audit Program for Oil & Gas

Apple, Cindy Beeler gave us your name to forward any comments we had on this New Owner audit program. Below are the comments Utah came up with.

1. The time given to correct engineering or design issues in no. 11 on page 3 may be inordinate, depending on the term length of the audit agreement. Please consider limiting the time for correction to a number of days (e.g. 60 days or 90 days, etc.) rather than allowing until the end of the audit agreement.
2. As written, the definition for Tank Systems in Appendix A no. 10, would not apply to tanks that do not have vapor control systems. Companies may acquire producing well sites with tanks that should have a vapor control system, but upon purchase did not. Consider changing the definition to include such tanks.
3. Typo in Appendix B, paragraph 4.A. - "Potential Minimum Instantaneous Flow Rate" should be "Potential Minimum Instantaneous Vapor Flow Rate"
4. The Audit Instruments required by Appendix C, no. 1 would most likely be described or found in the Field Survey SOP required by Appendix B, no. 3. Please consider inserting references in each of these sections of the Agreement so that companies aren't developing multiple documents for these two requirements.

Thanks

Rusty Ruby

